

Exhibit A

30 UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA :

-against- :

AFFIDAVIT

FRANK SEGUI

Defendant. : 19-CR-188 (KAM)

-----X

FRANK SEGUI swears under penalties of perjury, pursuant to Title 28 U.S.C. §1746, that the following is true and correct:

1. I am the defendant in the above-captioned case.
2. On the evening of February 22, 2019, I was at the Port Authority Bus Terminal in Manhattan. I had purchased tickets for a Greyhound bus and was waiting in the food court area. A man working at one of the food places asked me to leave. I did not leave. He threatened to call the police. I said okay and stayed. The police arrived and I got up to leave. He taunted me and I walked toward him, but did not attack or threaten him and was several feet away from him. The police grabbed me. I stiffened a bit but did not resist. They arrested me, put me in handcuffs and took me to the police station there.
3. I didn't cause or intend to cause any public inconvenience, annoyance or alarm. I didn't engage in fighting or in violent or threatening behavior. I did not make much noise, use abusive or obscene language, make any obscene gesture, or obstruct vehicular or pedestrian traffic. There was no one else present, except possibly one or two other people.
3. The police questioned me at the police station. They later took me to Central Booking,

but I never saw a judge or an attorney. Instead, they turned me over to FBI agents, who questioned me further.

4. My lawyer prepared this affidavit and asked me to review it for accuracy. It does not set forth all of the facts of which I am aware. My lawyer explained to me that not every fact we discussed needed to be included here for the purpose of the motion he was filing.

DATED: New York, New York
August 23, 2019


FRANK SEGUI